

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PRAGNESHKUMAR PATEL,

Defendant.

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19-CR-1631 DHU

**RAKSHABEN PATEL'S PETITION FOR HEARING ON FORFEITURE OF REAL
PROPERTY LOCATED AT 7640 CENTRAL AVENUE SOUTHWEST,
ALBUQUERQUE NEW MEXICO 87108**

Rakshaben Patel, respectfully requests this Court to schedule a hearing on the forfeiture of real property located at 7640 Central Avenue, Southwest, Albuquerque, New Mexico 87108 described at LT 1-A BLK 1 PLAT OF LT 1-A BLK 1 B M MORE ADDITION COUNT O, Bernalillo County, New Mexico, County Clerk of Bernalillo County, New Mexico Assessor's parcel number 101905720306931415, and states as follows:

1. Rakshaben Patel is 75% owner of 7640 Central Avenue, Southwest, Albuquerque, 87108, Bernalillo County, New Mexico, and request a hearing on the preliminary order of forfeiture.
2. Ms. Patel is an "innocent owner" of the property in question, of 75 percent of the property, and qualifies for the innocent owner exception under statute and case law.
3. Ms. Patel obtained her interest through purchase of the property, which documents will be produced in connection with a hearing on this matter.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm

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I hereby certify that a true and correct copy
of the foregoing was electronically submitted
this 7th day of December, 2023 to:

Counsel Listed through the CM/ECF Filing System

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm

I attest and declare under penalty of perjury that my petition is not frivolous and the information provided in support of my petition is true and correct to the best of my knowledge and belief.

R. R. Patel

Signature

Rakshaben Patel

Printed Name

12/06/2023

Date